

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE AT CHATTANOOGA**

TERPSEHORE MARAS,

*Plaintiff,*

v.

CHATTANOOGA NEWS CHRONICLE, *et al.*,

*Defendants.*

Case No. 1:21-cv-317

**MOTION TO DISMISS OF THE HONORABLE STEVE COHEN**

Pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, Defendant the Honorable Steve Cohen, U.S. Representative for the 9th Congressional District of Tennessee, through counsel, respectfully moves to dismiss Plaintiff Terpsehore Maras's Amended Complaint (November 29, 2021) (ECF No. 1-2). For the reasons set forth in the accompanying Memorandum of Points and Authorities, the Complaint should be dismissed.

Respectfully submitted,

/s/ Douglas N. Letter

DOUGLAS N. LETTER (D.C. Bar No. 253492)

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\* Attorneys in the U.S. House of Representatives Office of General Counsel are "entitled, for the purpose of performing the counsel's functions, to enter an appearance in any proceeding before any court of the United States or of any State or political subdivision thereof without compliance with any requirements for admission to practice before such court." 2 U.S.C. § 5571(a).

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*Counsel for Defendant Steve Cohen*

**CERTIFICATE OF CONSULTATION**

Pursuant to the Court's Order Governing Motions to Dismiss, ECF No. 7, on January 20, 2022, counsel for Defendant Congressman Cohen conferred via email with Counsel for the Plaintiff and parties were unable to reach an agreement that the pleading is curable by a permissible amendment.

/s/ Douglas N. Letter  
DOUGLAS N. LETTER

January 21, 2022

### **CERTIFICATE OF SERVICE**

I hereby certify that on January 21, 2022, I caused the foregoing document to be filed via the CM/ECF system for the U.S. District Court for the Eastern District of Tennessee, which I understand caused service on all registered parties. I further certify that I served a copy of the foregoing via Federal Express on the following non-registered filers:

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/s/ Douglas N. Letter  
DOUGLAS N. LETTER